

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF WISCONSIN
U.S. DISTRICT COURT
EASTERN DISTRICT-WI
GREEN BAY DIV.

UNITED STATES OF AMERICA

09 AUG 28 P2:14

V.

CRIMINAL COMPLAINT

LISA R. MUSSER,
a.k.a. LISA R. CURRY
(d.o.b. [REDACTED] 73)

CASE NUMBER: 09-M- 645


I, Patrick Amerson, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief that in or about November 2008 and continuing until August 25, 2009, in the Eastern District of Wisconsin and elsewhere, Lisa R. Musser, a.k.a. Lisa R. Curry did knowingly and unlawfully fail to register and update a registration as required by the Sex Offender Registration and Notification Act.

In violation of Title 18, United States Code, Section 2250(a).

I further state that I am a Deputy Marshal with the United States Marshal Service, and this complaint is based on the following facts:

Please see the attached affidavit.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No



Signature of Complainant
Patrick Amerson

Sworn to before me and subscribed in my presence,

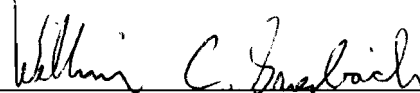
August 28, 2009

Date

at Green Bay, Wisconsin

City and State

The Honorable William C. Griesbach
United States District Judge
Name & Title of Judicial Officer



Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT & ARREST WARRANT

Patrick Amerson, being first duly sworn, states that:

Background

1. I am a Deputy Marshal with the United States Marshal Service. I have been a deputy marshal for 18 years and a law enforcement officer for approximately 22 years. As part of my duties, I investigate and have received training related to violations of federal laws including those involving fugitives and failure to register as sex offender as proscribed in 18 U.S.C. § 2250.

Basis for Information in Affidavit

2. The information contained in this affidavit is based upon my personal knowledge and investigation, and information supplied to me by other law enforcement officers from the U.S. Marshal's Service and the Marion County, Florida, Sheriff's Department, all of whom I believe to be truthful and reliable. Based on my investigation and the information supplied to me by other law enforcement personnel, I have probable cause to believe the following regarding Lisa Renee Musser, a.k.a. Lisa R. Curry.

Facts Establishing Probable Cause

3. In July 1996, Lisa R. Musser, a.k.a. Lisa R. Curry, was convicted in Florida State Court of Lewd, Lascivious Act in Presence of a Minor, a felony, in violation of Florida Statute 800.04(4)(a). Musser was placed on probation for this violation but her probation was revoked in November 1997 and she was sentenced to six month jail term. In November 2008, Musser was convicted in Florida State Court of a financial crime involving the exploitation of the elderly.

4. As a result of her lewd and lascivious conviction, Musser was advised that she was

required to register her current address on at least a bi-yearly basis with the Florida Department of Law Enforcement (FDLE). Musser registered her current address with FDLE on at least the following dates: July 31, 2002, 8/21/04, 1/21/05, 4/22/05, 1/30/06, 12/13/06, 1/28/08, 4/9/08, and 6/18/08. The registration documents provide that if the reporting person is employed, carries on a vocation, or becomes a permanent resident of another state, that registration must occur in that state.

5. Shortly after her conviction involving exploitation of the elderly, Musser, without permission nor proper notice to the authorities, left the jurisdiction of Florida and resided in Bear Creek, located in the state and Eastern District of Wisconsin. In August 2009, I received information that Musser was residing at this address with W.J. I confirmed with a local postal inspector that W.J. and Kelly Raimos, believed to be an alias for Musser, received mail at this address. On August 25, 2009, I went to the residence at this address and met with W.J. and several other individuals. I asked them if Musser was in the residence and was told she was not. I was given permission to search the residence and found Musser hiding in the corner of the attic. I then arrested Musser.

6. After Musser was read her *Miranda* rights, she agreed to speak with me about this investigation. Musser stated she was glad that this happened, meaning her arrest, as she was tired of “looking over her shoulder.” Musser knew that there were warrants for her arrest and that she rarely left the residence where she resided with W.J. Musser said that she recently went to Florida and that W.J. had given her approximately three thousand dollars to help pay her outstanding fines. However, Musser returned to Wisconsin without paying the outstanding fines or resolving the warrants.

7. Musser advised that she was released from the Marion County Jail in Ocala, Florida in early November 2008. Upon her release, Musser met with her probation officer and requested transfer to Jacksonville, Florida. That request was denied. Musser said she traveled to Jacksonville anyway and, within a day or two, met an over the road trucker who agreed to take her to Wisconsin as she wanted to leave Florida. Musser lived with the trucker in Bear Creek, Wisconsin for several days before moving in with W.J. While living with W.J., Musser said that she used an alias of Kelly Musser. Musser agreed that she had a prior conviction for lewd and lascivious acts with a minor and was aware that she was required to register any address change even if she moved out of state. Musser advised that she failed to advise the authorities of her Wisconsin address as she didn't want to get arrested on the Florida warrants.

8. I also spoke with W.J. about Musser. W.J. confirmed that he met Musser in early November 2008 and shortly thereafter, she moved in with him. W.J. said that he knew her name to be Kelly Musser but also knew that she used the alias of Lisa Musser, Lisa Curry, Lisa Janke and Kelly Raimes. W.J. said that Musser had told him that she had outstanding warrants in Florida.

9. Based upon the foregoing information, I believe there is probable cause that Lisa R. Musser failed to properly register in Wisconsin as a sex offender in violation of 18 U.S.C. § 2250.

10. Because this affidavit is offered for the limited purpose of supporting the criminal complaint and arrest warrant for Lisa R. Musser, I have not set forth every fact known to me regarding this incident. Rather, I have included only those facts which I believe establish probable cause.